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October 22, 2015

-VIA ELECTRONIC FILING-

Carlotta Stauffer, Director Division of Commission Clerk Florida Public Service Commission 2540 Shumard Oak Blvd. Tallahassee, FL 32399-0850

Re: Docket No. 150085-EG; FPL's Responses to Staff's Fourth Data Request

Dear Ms. Stauffer:

Please find enclosed FPL's responses to Staff's Fourth Data Request, Nos. 1-4. If there are any questions regarding this filing, please contact me at 561-304-5226.

Sincerely,

s/ Jessica A. Cano Jessica A. Cano Fla. Bar No. 0037372

Florida Power & Light Company

700 Universe Boulevard, Juno Beach, FL 33408

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Q.

Please refer to the FPL Residential BuildSmart Program Standards. As part of its description of the Program Standards, FPL does not mention the Incentive amount to be paid to participating builders, except the Optional Financial Incentives.

- a. Please specify the amount of financial incentive to be paid to builders, and how this is to be determined.
- b. Please discuss how the combined value of the total incentives to builders compares to the maximum \$894 per participant cap.

А.

- a. There are three types of incentives a builder can receive through the BuildSmart[®] program, two of which are financial:
 - First, for homes which meet the BuildSmart[®] performance requirements (as specified in the "BuildSmart[®] Certification Eligibility Requirements" section of the Program Standards), a builder will receive a BuildSmart[®] certificate. This incentive is not "financial" in nature, but nonetheless is valuable to a builder.
 - Second, a builder can also receive a promotional incentive of \$50 if the home is certified both as BuildSmart[®] by FPL and as ENERGY STAR[®] qualified by the Environmental Protection Agency.
 - Finally, the builder can receive \$75 dollars as a verification reimbursement if the builder has a Registered, Class 1 Home Energy Rating System (HERS), as defined in Florida Administrative Code 9B-60.002, conducted in lieu of an FPL-performed field verification.
- b. The combined values of the financial incentives shown in FPL's response to subpart (a) are less than the maximum amount of \$894. They are the same as the amounts FPL has provided to builders through this program since 2006 and therefore FPL believes they represent appropriate and administratively cost-efficient amounts needed to achieve the participation levels provided in FPL's DSM Plan.

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Q.

Please refer to the FPL Business Custom Incentive Program Standards. Please describe for projects proposed under this program, what type records will be kept and for what duration in the event of a dispute regarding a project's eligibility.

A.

Records for projects that FPL determines do not qualify for the BCI program will be kept for three (3) years. The types of information retained will include the savings analysis, the screening application, the cost-effectiveness screening test results, and potentially other documents if additional supporting information is submitted.

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Q.

Please refer to the FPL Business Custom Incentive Program Standards. Please discuss how FPL intends to address Administrative costs in its evaluation of the cost-effectiveness analysis performed for this program.

A.

All administrative costs for the BCI program are reflected in the cost-effectiveness screening tests. These costs include: (a) pre- and post-inspections; (b) monitoring and verification; and (c) the proportionate share of FPL's annual BCI program management costs (based on the project's percent of the total projected kW of all BCI projects for the year).

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Q.

Please refer to the FPL Business Custom Incentive Program Standards. Under Eligibility Requirements, FPL notes that proposed equipment or standards must "not have failed recent FPL cost-effectiveness screening."

- a. Please explain why this provision is necessary given that any project must demonstrate cost-effectiveness with the RIM and Participants Tests and have payback period in excess of 2 years in order to be approved and receive a rebate.
- b. Please define how FPL interprets "recent" in this context.
- c. Please discuss whether this term prevent a company from revising a proposal to make it cost-effective.
- d. Please discuss whether bundled equipment and measures would be disqualified under this method if one or more of the components failed a recent FPL cost-effectiveness screening.

A.

- a. This purpose of this provision is to avoid unnecessary administrative costs in the Business Custom Incentive (BCI) program. If FPL has already determined that a particular technology fails the cost-effectiveness testing, it would be administratively inefficient to be required to rerun such technologies again just because a customer submitted it through the BCI program. Additionally, because inputs to the cost-effectiveness analyses may change from time to time, this provision eliminates the potential for a customer to request that FPL rerun the cost-effectiveness of such technologies multiple times.
- b. This refers to the cost-effectiveness analyses which were performed for the DSM Goals docket (Docket No. 130199-EI).
- c. No, it does not. The purpose of the provision is technology-specific, and is solely for administrative efficiency. Please also see FPL's response to subpart (a).
- d. FPL does not perform cost-effectiveness analyses for BCI projects on a bundled basis. If a particular technology was previously found to not be cost-effective on its own, then FPL would not allow subsidization of its non-cost-effective performance by bundling it with a more cost-effective technology.